

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC., PELVIC
REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**THIS DOCUMENT RELATES TO
THE CASES ON THE EXHIBITS
ATTACHED HERETO**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibits A - M, and Defendants, Johnson & Johnson, Ethicon, Inc. and/or Ethicon LLC (collectively, the "Ethicon Defendants"), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Laura J. Baughman
Laura J. Baughman
Baron & Budd
3102 Oak Lawn Avenue
Suite 1100
Dallas, TX 75219
(214) 521-3605
lbaughman@baronbudd.com

/s/ Mathew Coveney
Mathew Coveney
Coveney Law
1075 Main Street
3rd Floor
Waltham, MA 02451

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)

(508) 449-4228
mcoveney@unitedlawteam.com

/s/ Mary Elizabeth Graham
Mary Elizabeth Graham
Grant & Eisenhofer
123 South Justison Street
Wilmington, DE 19801
(302) 622-7110
egraham@gelaw.com

P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

/s/ Lisa Ann Gorshe
Lisa Ann Gorshe
Johnson Becker
33 South Sixth Street
Suite 4530
Minneapolis, MN 55402
(612) 436-1800
lgorshe@johnsonbecker.com

/s/ Sean Michael Cleary
Sean Michael Cleary
Law Offices of Sean M. Cleary
19 West Flagler Street
Suite 618
Miami, FL 33130
(305) 416-9805
sean@clearypa.com

/s/ Yvonne M. Flaherty
Yvonne M. Flaherty
Lockridge Grindal Nauen
100 Washington Avenue South
Suite 2200
Minneapolis, MN 55401
(612) 339-6900
ymflaherty@locklaw.com

/s/ Marc Stanley Whitehead
Marc Stanley Whitehead
Marc Whitehead & Associates
5300 Memorial Drive
Suite 725
Houston, TX 77007
(713) 228-8888
marc@marcwhitehead.com

/s/ Alan S. Lazar

Alan S. Lazar
Marlin & Saltzman
29229 Canwood Street
Suite 208
Agoura Hills, CA 91301
(818) 991-8080
alazar@marlinsaltzman.com

/s/ Donald A. Migliori

Donald A. Migliori
Motley Rice
321 South Main Street
Suite 200
Providence, RI 02903
(401) 457-7700
dmigliori@motleyrice.com

/s/ Alyson Oliver

Alyson Oliver
Oliver Law Group
950 West University Drive
Suite 200
Rochester, MI 48307
(248) 327-6556
aoliver@oliverlg.com

/s/ Jeffrey S. Glassman

Jeffrey S. Glassman
The Law Offices of Jeffrey S. Glassman
One Beacon Street
Suite 3333
Boston, MA 02108
(617) 367-9999
jsg@jeffreysglassman.com

/s/ John G. Simon

John G. Simon
Amy Collignon Gunn
The Simon Law Firm
800 Market Street
Suite 1700
St. Louis, MO 63101
(314) 241-2929
jisimon@simonlawpc.com
agunn@simonlawpc.com

/s/ Amy Collignon Gunn

Amy Collignon Gunn
The Simon Law Firm
800 Market Street
Suite 1700
St. Louis, MO 63101
(314) 241-2929
agunn@simonlawpc.com

/s/ Erin M. Wood

Erin M. Wood
Waters & Kraus
3141 Hood Street
Suite 700
Dallas, TX 75219
(214) 357-6244
ewood@waterskraus.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A
(Baron & Budd)

Civil Action No.	Case Style
2:15-cv-05901	Debra Norris and Robert Norris v. Ethicon, Inc.; Johnson & Johnson
2:17-cv-01815	Amanda Moore v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT B
(Coveney Law)

<u>Civil Action No.</u>	<u>Case Style</u>
2:16-cv-12230	Deborah Pearson v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-12233	Patricia H. Tomberlin v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT C
(Grant & Eisenhofer)

<u>Civil Action No.</u>	<u>Case Style</u>
2:18-cv-00375	Marie E. Goodgame v. Ethicon, Inc.; Johnson & Johnson
2:18-cv-00383	Melanie T. Gallian v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT D
(Johnson Becker)

Civil Action No.	Case Style
2:13-cv-33879	Melissa Shellnut and John Shellnut v. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:16-cv-01868	Irene E. Borland v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT E
(Law Offices of Sean M. Cleary)

<u>Civil Action No.</u>	<u>Case Style</u>
2:14-cv-11757	Donna Myers v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson

EXHIBIT F
(Lockridge Grindal Nauen)

<u>Civil Action No.</u>	<u>Case Style</u>
2:14-cv-29017	Eudene Hood v. Ethicon, Inc.; Johnson & Johnson
2:17-cv-02806	Stacie Young and Steven Young v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT G
(Marc Whitehead & Associates)

<u>Civil Action No.</u>	<u>Case Style</u>
2:16-cv-11635	Tammy Ash v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-11636	Cheryl Camille Casebolt v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-11752	Angie Montejano v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT H
(Marlin & Saltzman)

<u>Civil Action No.</u>	<u>Case Style</u>
2:13-cv-01981	Sharon Jackson and Robert Jackson v. Ethicon, Inc.; Johnson & Johnson
2:15-cv-07478	Gloria Boothe v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT I
(Motley Rice)

<u>Civil Action No.</u>	<u>Case Style</u>
2:17-cv-00953	Esther L. Ramos v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-05276	Barbara Sprague and Thomas Sprague v. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC

EXHIBIT J
(Oliver Law Group)

Civil Action No.	Case Style
2:17-cv-03702	Kimberly Grimsic and Steven Grimsic v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT K
(The Law Offices of Jeffrey S. Glassman)

Civil Action No.	Case Style
2:14-cv-27244	Pamela Travers and Joseph Travers v. Ethicon, Inc.; Johnson & Johnson
2:15-cv-07434	Mary Teague and Thomas Teague v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT L
(The Simon Law Firm)

Civil Action No.	Case Style
2:17-cv-01100	Elyece Paholke and Herold Paholke v. Ethicon, Inc.; Johnson & Johnson
2:17-cv-04585	Vickey Engel v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT M
(Waters & Kraus)

Civil Action No.	Case Style
2:14-cv-02162	Anna Marie Holmes v. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:18-cv-01024	Christina Winters and Rick Winters v. Ethicon, Inc.; Johnson & Johnson